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March 31, 2020

VIA ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Ashu et al, 19 Cr. 318 (JMF) – Expedited Letter-Motion Seeking Bail

Dear Judge Furman:

We are counsel to Defendant Cyril Ashu and write respectfully to propose that the Court order Mr. Ashu's release on bail on the conditions described below. We have conferred with the Government, which consents to bail on these conditions.

Mr. Ashu was arrested on May 8, 2019 in Atlanta, Georgia and transferred to this District for arraignment on May 30, 2019. He previously consented to detention without prejudice to making a future bail application. Mr. Ashu pleaded guilty to a superseding Information on October 10, 2019 and currently awaits sentencing at the MDC in Brooklyn.

The Government has agreed to Mr. Ashu's release on the following bail conditions:

- (1) A \$250,000 personal recognizance bond, co-signed by Mr. Ashu's wife and three additional financially-responsible persons;
- (2) Strict supervision by Pre-Trial Services in the Northern District of Georgia;
- (3) Mr. Ashu's residence will be approved in advance by Pre-Trial Services, and home incarceration at that residence will be enforced by GPS monitoring;
- (4) Mr. Ashu's travel will be restricted to the district of supervision and the Southern and Eastern Districts of New York, as well as any necessary points in between;

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- (5) Mr. Ashu will surrender any personal travel documents not already in the possession of Pre-Trial Services and make no new applications for travel documents;
- (6) Mr. Ashu's wife and minor child will surrender any travel documents and make no new applications for travel documents;
- (7) Mr. Ashu will not possess the personally identifying information of any other person, with the exception of the personally identifying information of his wife and minor child;
- (8) Mr. Ashu will not communicate with his co-defendants or witnesses in this action, except in the presence of counsel; and
- (9) Mr. Ashu will comply with all other standard conditions of supervised release (*e.g.*, shall not commit other crimes, possess a firearm, *etc.*).

All conditions must be complied with before Mr. Ashu is released, except that the three financially responsible persons may be interviewed by the Government by telephone and co-sign the bond within one week after Mr. Ashu's release.

As the Court is aware, the coronavirus is widely present within New York at large, and may spread quickly within the confined space of a prison, including the MDC where Mr. Ashu is presently incarcerated. Accordingly, we respectfully request that the Court approve this application on an expedited basis and direct the Pre-Trial Services Agency to make the necessary arrangements as quickly as possible.

Respectfully,

/s/ Marc Greenwald

Marc Greenwald

cc: AUSAs Olga Zverovich and Jarrod Schaeffer (via ECF)